

**OR CZARA Issue List (Draft, 7/28/13)**

1. Whether new management measures can Ex. 5 - Attorney Client or should be added for ag (Lead: Alan).
2. Whether ag MMs continues to meet threshold for approvability now that we have better knowledge of the AWQMA Program and it is clear the plans are voluntary. Would OR need to meet the "3-prong" test for voluntary programs even though we didn't condition OR's program as such back in 1998? (Lead: Alan)
3. Penalty amount for EPA (baseline? Compounding?)(Lead: Don or Jayne)
4. Whether EPA/NOAA would approve additional forestry MMs/riparian if riparian rule includes management measures that adequately protect riparian areas of medium and small fish bearing streams but fails to address non-fish bearing streams (Lead: Alan).
5. Threshold for back-up enforcement authority for OSDS (Lead: Don).
6. Concerns about Oregon's monitoring program, even though EPA/NOAA did not public notice those MMs (and how to address concerns raised about other MMs not raised during the public comment period (Lead: Allison).
7. Whether EPA/NOAA can approve additional MMs for Forestry for roads, given the lack of a sufficient description of voluntary program focused on preventing water quality impacts from legacy roads. (Lead: Chris)
8. Whether EPA/NOAA can approve additional MMs for Forestry for landslide prone areas, given the following deficiency: inadequate approach to addressing high-risk landslide prone areas with the potential to impact water quality and designated uses (Lead: Chris).
9. Whether EPA/NOAA can approve additional MMs for forestry/pesticides. How do we want to handle our pesticides decision with the ESA/label negotiations still ongoing between other parts of our agencies? (Lead: Jenny).